

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: : CHAPTER 7
SAHAR ZAMIR :
DEBTOR(S)/MOVANT(S) : CASE NO. 19-63015-JWC
VS :
DAVID WASSERMAN :
(Claim Amount of \$198,453.81- Filed 8-28-19) :
RESPONDENT :

MOTION TO AVOID LIEN FOR ACTION UNRELATED
TO DIVORCE AND CUSTODY

Debtor respectfully show:

1.

Respondent has or claims to have a non-possessory, non-purchase money security interest in household furnishings, household goods, wearing apparel, appliances, books, musical instruments of the Debtor.

2.

Each Debtor's interest in the property referred to in the preceding paragraph does not exceed \$300.00 in value in any particular item and the aggregate value does not exceed \$5,000.00 for each Debtor.

3.

All of the subject property is held primarily for the personal, family or household use of the Debtor or a dependent of the Debtor.

4.

Said lien of Respondent impairs an exemption to which each Debtor is entitled to under O.C.G.A. 44-13-100(a) (4) and (6) and is therefore avoidable under 11 U.S.C. Section 522(f).

5.

This Motion does not affect any lien which Respondent may have in a motor vehicle or in any property not described in paragraph 1 above.

6.

We would like to request the following attorney fees dischargeable due to their unrelated action of divorce and custody in which case it took place.

\$11,005.00 for filing a False Temporary Protective Order

\$930.00 Debtors Motion for Contempt

\$1,813.00 Improper arrest

\$4,095.50 Debtors Motion for Contempt

TOTAL: \$17,888.50

WHEREFORE, Debtor prays that said lien of Respondent be avoided, that Respondent be ordered to take all steps necessary to discharge the lien of record and for all other appropriate relief.

Respectfully submitted,

/s/ 

ROBERT A. CHAMBERS

Attorney for Debtor

State Bar No. 119450

LAW OFFICE OF ROBERT A. CHAMBERS

6488 Spring Street

Suite 103

Douglasville, GA 30134

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RESPONDENT :

NOTICE OF REQUIREMENT OF RESPONSE TO MOTION
TO AVOID LIEN ON EXEMPT PROPERTY AND TIME TO FILE SAME

NOTICE IS HEREBY GIVEN that a motion to avoid a lien on exempt property pursuant to 11 U.S.C. Section 522 has been filed in the above-styled case on November 19, 2019.

NOTICE IS FURTHER GIVEN that, pursuant to Local Rule 6008-2 NDGa., the Respondent must file a response to the motion within 21 days after service, exclusive of the day of service, and serve a copy of same on Movant and Movants' attorney. In the event that no response is timely filed and served, then the Bankruptcy Court may enter an order granting the relief sought.

This 19th day of November, 2019.

Respectfully submitted,

/s/ 

ROBERT A. CHAMBERS
Attorney for Debtor
State Bar No. 119450

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RESPONDENT :

CERTIFICATE OF SERVICE

The undersigned ROBERT A. CHAMBERS, 8440 Courthouse Square, East, Suite A, Douglasville, GA 30134, hereby certifies:

That I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on November 19, 2019, I served a copy of the within and "Notice of Requirement of Response to Motion to Avoid Lien On Exempt Property and of Time to File Same" together with the "Motion to Avoid Lien" filed in this bankruptcy case on:

Kathleen Steil
Standing Chapter 7 Trustee
Ogier, Rothschild & Rosenfeld, PC
P.O. Box 1547
Decatur, GA 30031

David Wasserman
c/o Marvin L. Solomiany, Attorney
Kessler & Solomiany, LLC
101 Marietta Street
Suite 3500
Atlanta, GA 30303
CERTIFIED MAIL RECEIPT NO.
7018 0680 0000 3738 1163

REGISTERED AGENT:

No registered agent listed with the Georgia Secretary of State
As of November 19, 2019.

by depositing a copy of same in the United States Mail.

This 19th day of November, 2019.

Respectfully submitted,

/s/ _____
ROBERT A. CHAMBERS
Attorney for Debtor
State Bar No. 119450